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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
FEBRUARY 22, 2016 TERM
SHEET PURSUANT TO MAY 25,
2017 MINUTE ORDER**

Trial Date: October 2, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff's Administrative Motion to File Under Seal the February 22, 2016 Term
6 Sheet Pursuant to May 25, 2017 Minute Order. (ECF No. 509.)

7 2. The February 22, 2016 Term Sheet contains non-public, highly confidential
8 information relating to acquisition agreements of Uber, including highly confidential business
9 information relating to Uber's (a privately held corporation) corporate structure and highly
10 confidential information relating to terms of the agreements. It contains highly sensitive business
11 information that is not publicly known, and its confidentiality is strictly maintained. I understand
12 that this information could be used by competitors to Uber's detriment, including in the context of
13 negotiating business deals.

14 3. In addition, the Term Sheet discusses Uber's proprietary and highly confidential
15 designs for Uber's custom LiDAR system and Uber's detailed market strategy information. If
16 such information were made public, I understand Uber's competitive standing could be
17 significantly harmed.

18 4. Defendants' request to seal is narrowly tailored to the document that merits
19 sealing.

20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed this 26th day of May, 2017, in Cambridge, Massachusetts.

22
23 /s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: May 26, 2017

/s/ Arturo J. González
Arturo J. González